

Message

From: Borgias, Adriane P. (ECY) [ABOR461@ECY.WA.GOV]
Sent: 4/4/2018 4:30:22 PM
To: Doug Krapas [dougkrapas@iepcoco.com]; Lisa Dally Wilson [Ex. 6 Personal Privacy (PP)]; tom@agnewconsulting.com; Edmondson, Lucy [Edmondson.Lucy@epa.gov]; Olsen, Catherine [colsen@spokanecity.org]; lahtig@wsdot.wa.gov; Williams, Tammie [WilliamT@wsdot.wa.gov]; Whitman, Kara Michelle [kmwhitman@wsu.edu]
Subject: RE: Regulatory Reform/TSCA workgroup: work plan

Thanks Doug.

I appreciate the energy and effort that you devote to this topic. I wanted to offer up a few thoughts before the meeting.

We have from the beginning of the Task Force noted that there is a discrepancy in the allowable concentrations of PCBs in products and the regulated levels once those products are part of a wastewater discharge. This means that focusing our TSCA efforts on the basic pollution prevention principles of "don't make it" and "manage it better" can be quite effective in preventing a material from being in the wastewater and requiring expensive "end of pipe" management.

The issues that we have brought up with EPA in our previous letters remain relevant and to that extent I hope we can continue to have conversations with EPA around these TSCA topics:

- 1) Finding acceptable substitutes for and limiting the use of products that contain inadvertently produced PCBs. You have identified diarylide yellow as a possible candidate for this effort.
- 2) Lower the allowable level of PCBs in inadvertently produced PCBs to less than 50 ppm.
- 3) Doing a check on products coming into our country that may have PCBs in exceedance of regulatory levels. For example, when Japan did something similar for diarylide pigments, there were pigment manufacturers that were supplying products orders of magnitude higher than 50 ppm.

I like the draft tasks that you have presented. Some of the suggested policy issues are more feasible than others. And some may not fall within the core mission of the Task Force, which is finding and reducing sources of PCBs. Therefore, once this list is vetted by the group, it is important to have the larger Task Force weigh in.

Thanks again for stepping up to the challenge.

Adriane P. Borgias

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From: Doug Krapas [mailto:dougkrapas@iepcoco.com]
Sent: Tuesday, April 3, 2018 11:05 AM
To: Borgias, Adriane P. (ECY) <ABOR461@ECY.WA.GOV>; Lisa Dally Wilson <[Ex. 6 Personal Privacy (PP)]>; tom@agnewconsulting.com; Edmondson.Lucy@epa.gov; Olsen, Catherine <colsen@spokanecity.org>; lahtig@wsdot.wa.gov; Williams, Tammie <WilliamT@wsdot.wa.gov>; Whitman, Kara Michelle <kmwhitman@wsu.edu>
Subject: FW: Regulatory Reform/TSCA workgroup: work plan

Adriane, et.al: in regards to your request for an agenda for the meeting (Meeting goals and objective, order of discussion?), please see the attached documents. My intent is to go through the "2018 Plan of Activities" document as the agenda. I would like to share my thoughts on the development of a plan to accomplish the goals of this document, how to proceed with the various activities outlined, assignment of responsibilities to both lead these activities and any necessary support resources, and feasibility and/or prioritizing of what I have outlined.

You are all key individuals within your organizations, have knowledge and interest regarding these activities, and possess expertise to help develop and move these strategies forward. Therefore, I am seeking your feedback, insights, support and scrutiny of what I have outlined above.

Thank you for your involvement and I look forward to our discussion tomorrow.

Doug

Doug Krapas
Environmental Manager



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From: Doug Krapas
Sent: Wednesday, February 14, 2018 4:42 PM
To: 'Page, C'
Cc: Borgias, Adriane P. (ECY) (ABOR461@ecy.wa.gov); tom@agnewconsulting.com; 'Lisa Dally Wilson' ([Ex. 6 Personal Privacy \(PP\)](#)); Whitman, Kara Michelle
Subject: RE: Regulatory Reform/TSCA workgroup: work plan

Hey Chris – I apologize for the belated response to this request, but finally had the opportunity to develop my thoughts onto paper for the activities surrounding the TSCA concern. Attached is a summary document of the tasks that I have been working on and some that have been rolling around in my head. Also included are a couple of supporting documents. It is difficult for me to put any timelines on these activities since they are quite complex and not all have defined pathways. We likely need to break some of these tasks down and pass them to other leadership to pursue as I do not have the time and resources to lead all of them on my own.

I welcome your thoughts as well as others copied on this email as how best to manage the attached.

Doug

From: Page, C [<mailto:c.page@wsu.edu>]
Sent: Wednesday, December 06, 2017 10:14 AM
To: Doug Krapas
Cc: Borgias, Adriane P. (ECY) (ABOR461@ecy.wa.gov); tom@agnewconsulting.com; 'Lisa Dally Wilson' ([Ex. 6 Personal Privacy \(PP\)](#)); Whitman, Kara Michelle
Subject: Regulatory Reform/TSCA workgroup: work plan

Hi Folks, as lead (Doug) and participants for this Task Force work group, the goal for 2017 was/is to have a work plan. Can you come up with a list of what actions have been discussed and planned, who will undertake them (by when), anticipated goal (maybe think outputs & outcomes), and any other pertinent bits of info?

I've dummied up a simple template (covering the next 18 months, as that is the current Comp Plan implementation project horizon) that I am sending to other workgroup leads, so if possible could you put what info you have (or can think of) into it?

Thanks!

-Chris Page, Senior Project & Development Lead, Extension Faculty (WSU)

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